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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

COUNTER WRAPS INTERNATIONAL
INC d/b/a DC MEDIA AND MARKETING,
a Nevada corporation,

Plaintiff,

vs.

DIAGEO NORTH AMERICA INC., a
Connecticut corporation; DIAGEO
AMERICAS INC., a Delaware corporation;
and DOES I through X;

Defendants.

Case No. 2:16-cv-02924-JCM-DJA

**STIPULATION FOR EXTENSION OF
TIME TO FILE THE JOINT PRETRIAL
ORDER (SECOND REQUEST)**

Pursuant to Local Rules 7-1, 26-1, and 26-4, Plaintiff Counter Wraps International Inc. d/b/a DC Media and Marketing ("Plaintiff") and Defendants Diageo North America, Inc. and Diageo Americas Inc. (collectively "Defendants" and, together with Plaintiff, the "Parties") hereby respectfully submit this Joint Application for an additional 18 days to file the Joint Pretrial Order, requiring that the Joint Pretrial Order be filed on or before November 3, 2020:

An extension of time is necessary because defense counsel previously understood the parties to have agreed a 60-day extension of the original deadline to file the Joint Pretrial Order, or until November 3, 2020. However, due to an oversight on the part of defense counsel, Defendants stipulated to and the Court ordered a new deadline as October 16, 2020, which date had been proposed by Plaintiff (ECF 58). Additionally, this case involves over 40,000 pages of documents that have to be reviewed for potential trial exhibits, and the Covid-19 pandemic and resulting stay at home orders have presented difficulties for defense counsel to review those documents.

The deadline for filing of the Joint Pretrial Order has been extended on one prior occasion (ECF 62).

Dated this 19th day of October, 2020

Dated this 19th day of October, 2020

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RANDOLPH LAW FIRM

By: /s/ Robert Hernquist
Robert Hernquist, Nevada Bar No. 10616
Jennifer Lloyd, Nevada Bar No. 9617

By: /s/ Paul Derby
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— AND —

*Attorneys for Defendants Diageo North
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SKIERMONT DERBY LLP
Paul Derby (admitted pro hac vice)
John O’Kane IV (admitted pro hac vice)

*Attorneys for Plaintiff Counter Wraps
International Inc. d/b/a DC Media and
Marketing*

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATE: October 20, 2020